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# AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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April 4, 2000

DEPT OF TRANSPORTATION  
DOCKETS  
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U.S. Department of Transportation Dockets  
Docket No. FAA-1999-6673 - 14  
400 Seventh Street, SW  
Room Plaza 401  
Washington, D.C. 20590

Subject: Notice of Proposed Rulemaking (NPRM) on Certification of Screening Companies ,

Dear Sir/Madam:

The Air Line Pilots Association, representing 55,000 pilots who fly for 51 airlines in the U.S. and Canada, has reviewed the subject NPRM. ALPA is a strong proponent of enhancements to the security screening checkpoint because of the numerous problems associated with it, many of which are publicly known. We have previously written in support of the concept of certifying the security screening companies (reference our letter of May 1, 1997, to the ANPRM) and are pleased to see that the FAA has incorporated in the NPRM a number of our recommendations from that letter.

## Low Wages and Turnover

Under the Introduction section, paragraph I.C., a discussion of the low wages and high turnover rates of screeners is included. These are both very well understood problems and we are quite disappointed that the NPRM fails to address them adequately. The Associate Administrator for Civil Aviation Security appeared before Congress recently and testified that turnover is as high as 400% at some locations. The text in this section says that turnover exceeds "100 percent in many locations," which is a gross understatement.

We have understood that one of FAA's principal purposes in certifying screening companies is to reduce turnover, however, the final rule will not be successful in this regard if adopted as proposed. We recommend the following three changes to the rule to address this oversight:

1. Identify each security screener as a "trainee" until they have accumulated six months of continuous service in that field of endeavor.
2. No security checkpoint (combination of one metal detector and one x-ray) may use more than one trainee during any shift.

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3. These provisions would be mandatory within one year of the effective date of the final rule.

#### Company Qualifications

The rulemaking fails to specify what kinds of qualifications a security screening company should have before it is granted a certificate. Companies already in existence may very well be “grandfathered,” but new entrants should be required to meet some stated minimum of corporate experience and competence in the field of security screening.

#### Background Checks

The NPRM proposes (§ 111.207(c)) to allow a prospective employee with a possible criminal record to continue through the employment process. “The trainee may receive sensitive security information unless and until the results of the record check disclose a disqualifying crime.” In our view, no one should be employed as a screener until the criminal records check proves negative. This provision would abrogate a fundamental principle of security and the obvious dangers outweigh any perceived discrimination against the potential employees.

Also, FAA must ensure that the criminal history records checks are requested and processed. Screening companies have employed individuals with criminal backgrounds for months or years before their criminal records were discovered. FAA needs to follow through with their own accountability process and ensure that the airlines and screening companies comply.

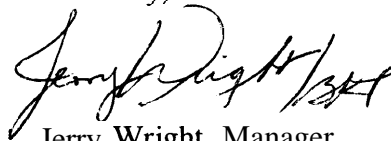
#### Employment Standards

Under § 111.205, Employment Standards, it states that to be a screener, a person must have a “high school diploma, GED or a combination of education and experience that the screening company has determined to have equipped the person to perform the duties of the screening position.” We believe that this text allows too much variation in the education of the applicant; a high school diploma or GED should be required as a minimum.

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Lastly, it is imperative that FAA enforce its regulations for speaking of the English language. Our members have noticed an increase in the number of security screeners who do not speak English well enough to converse properly with those being screened.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Wright", with a stylized flourish at the end.

Jerry Wright, Manager  
Security & Human Performance

JW:bkt